

REMARKS

This Amendment responds to the Office Action dated January 11, 2005.

The Examiner rejected claims 1-23 under 35 U.S.C. § 102(e) as being anticipated by Zeng et al., U.S. Patent No. 6,505,299 (hereinafter Zeng). Claim 23 has been canceled. Zeng discloses a video encoding system markedly different from those disclosed in the present application because the system of Zeng encodes pixel arrays by transposing pixel coefficients without regard to the direction of the axis of packetization relative to the direction of transposition. In fact, each of the embodiments disclosed by Zeng transposes pixel coefficients in a direction *along* the axis of packetization, rather than orthogonal to that axis.

FIG. 8 of Zeng indicates that coefficients in a slice 94 of a video are arranged by subbands for transposition within each respective subband. As can be seen in this figure, any coefficient transposed in its subband with another coefficient that is more than one space away within a column must be transposed along the direction of packetization. Similarly, any coefficient transposed in its subband to an even/odd position in its column, that matches its originating even/odd position in its column is transposed *only* in the direction of the axis of packetization. Only those coefficients that are both (1) transposed with a neighboring coefficient within a subband column and (2) transposed from an even position in a column to an odd position in a column, or vice versa, would be transposed only in a direction orthogonal to the axis of packetization.

None of Zeng's embodiments transpose coefficients only along a direction orthogonal to the axis of packetization. For example, referring to FIG. 9, during what Zeng describes as "constrained shuffled subband," the coefficients K, L, C, D, E, and F are all transposed in a

direction along the axis of packetization, causing the problems identified in applicant's Background of the Invention. This is true for each of the coding embodiments shown in FIGS. 9-11 of Zeng, as can be easily verified by the Examiner.

Independent claims 1 and 8, as amended, include the limitation "transposition of coefficients occurring only along an axis orthogonal to said axis of packetization." None of the coding embodiments of Zeng disclose this limitation, hence claims 1-14 are patentably distinguished over Zeng and should be allowable.

Independent claim 15 includes the limitations: "transposing selective one or more coefficients of a first of said selected arrays with selective one or more coefficients of a second of said selected arrays, transposition of coefficients occurring only along the direction of said first axis, and being identified by a cryptographic key" and "packetizing said coefficients of said plurality of arrays substantially along a second axis orthogonal to said first axis." Zeng does not disclose these limitations, hence claims 15-21 are patentably distinguished over Zeng and should be allowable.

Independent claim 22 includes the limitations of "a first axis orthogonal to an axis of packetization" and "transposition occurring only in the direction of said first axis." Zeng does not disclose these limitations, hence claim 22 is patentably distinguished over Zeng.

The applicant has added a new claim 24. This claim is distinguished over Zeng because that reference does not disclose the limitation "transposition of coefficients occurring only in a direction different from that of said axis of packetization." Hence claim 24 should be allowable.

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In view of the foregoing amendments and remarks, the applicant respectfully requests reconsideration and allowance of claims 1-22.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kurt Rohlf', written over a horizontal line.

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